

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:15-cr-467-HEA
)
KEVIN HUNTSPON,)
)
 Defendant.)

OBJECTIONS TO THE PRESENTENCE REPORT

COMES NOW Defendant, Kevin Huntspon, by and through counsel, and files the following objections to the presentence investigation report ("PSR"):

Paragraph 23 and Paragraphs 12, 14, 15, 27, 30, 69, and 70: Defendant objects to Paragraph 23's application of the two-level enhancement based on U.S.S.G. §2C1.2(b)(1), as well as to the factual bases recited in Paragraphs 12, 14, 15 in concluding that the offense involved more than one gratuity. Defendant objects to Paragraphs 27, 30, 69, and 70, which incorporate sentencing guideline calculations based upon the application of the enhancement detailed in Paragraph 23.

Dated: March 24, 2016

Respectfully submitted,

ROSENBLUM, SCHWARTZ & ROGERS, P.C.

By: /s/ John P. Rogers
JOHN P. ROGERS, #38743 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332/Facsimile (314) 862-8050
Email: jrogers@rsrglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Reginald L. Harris, assistant United States attorney.

/s/ John P. Rogers
